

# Privacy Statement

This Privacy Statement describes the processing of personal data related to Aktia Bank Plc's Annual General Meeting.

Updated on 9 March 2023.

## 1. Controller and contact information

Name	Aktia Bank plc
Address	Arkadiankatu 4–6, FI-00100 Helsinki (P.O. Box 207, FI-00101 Helsinki)
Business ID	2081702-8
Name of contact person	Jussi Mäkijärvi
Contact information	jussi.makijarvi (a) aktia.fi

## 2. Name of register

Aktia Bank Plc's Annual General Meeting register.

## 3. Purpose and legal basis for the processing of personal data

The purpose of processing of personal data is to make it possible to carry out the Controller's Annual General Meeting lawfully.

Personal data is processed only for purposes that are necessary for organising of the Annual General Meeting, such as to verify the registering person's identity and right of participation, to draw up the list of attendees, the list of votes and voting tickets, to organise voting and manage advance questions and requests to speak.

Innovatics Oy is responsible for the technical implementation of the registration system and advance voting for the Annual General Meeting. The list of shareholders is maintained by Euroclear Finland Ltd.

The processing of personal data is based on the Controller's statutory obligations.

## 4. Personal data to be processed

The personal data to be processed includes the shareholder's and their possible representative's name, personal identity code and/or business ID, address, contact information, number of shares and votes, voting information, mode of authentication, basis for representation, date of registration, and possible information concerning any assistant, power of attorney, advance questions and possible other additional information given in connection with the registration. For those attending the meeting, the time of arrival at the meeting and the time of leaving the meeting are also recorded. For the technical maintenance of the service and for monitoring, log data on registrations and voting and the user's IP address will also be recorded.

The register contains the register of shareholders on the record date created by Euroclear Finland for the Annual General Meeting, which contains, among other data, the shareholder's name, personal identity code/business ID, address and number of shares.

The register contains the temporary register of shareholders created by Euroclear Finland for the Annual General Meeting, which contains information on the holders of nominee registered shares who have registered to the Annual General Meeting and their number of shares.

## **5. Regular sources of data**

As a rule, personal data is collected from the person themselves or their representative in connection with the registration to the Annual General Meeting. For those registering via email, post or phone, the Controller or Innovatics Oy enters the registering person's personal data and advance votes into the register.

Based on the personal data provided in connection with the registration, Innovatics Oy retrieves the shareholder's number of shares from the register of shareholders created by Euroclear Finland Ltd. on the record date of the meeting.

Innovatics Oy enters into the register the voting instructions of the holders of nominee registered shares represented by account management organisations in the Annual General Meeting.

## **6. Disclosures of personal data**

Based on the register, the list of attendees and voting summaries are created and appended to the minutes of the meeting.

In accordance with the Finnish Limited Liability Companies Act, the register of shareholders, which contains, as per the record date of the meeting, the shareholders' name, municipality and number of shares and votes, is kept available at the Annual General Meeting. The register also contains the data of the holders of nominee registered shares that have been entered into the temporary register of shareholders for the Annual General Meeting.

## **7. Transfer of data to third parties and countries outside the EU or the European Economic Area**

The data contained in the register can be shared to third parties that participate in the organisation of the Annual General Meeting and require the register's data in their own operations. The data is not disclosed for commercial purposes.

Text messages to those who have registered are sent through a Swiss service. Otherwise personal data is not disclosed or transferred outside the EU or the European Economic Area.

## **8. Register protection principles**

Physical material is kept in a locked space with access only by those entitled to the data.

Electronic material is kept in a data centre that meets the requirements set for personal data processing. The data connection from the user's browser to the server is encrypted. Only a limited group of the Controller's and subcontractors' employees who require and process data to organise the Annual General Meeting have access to the register.

## **9. Retention and erasure of personal data**

Innovatics Oy retains personal data for no more than one year after the end of the Annual General Meeting.

Euroclear Finland Ltd. retains personal data for no more than four months after the end of the Annual General Meeting.

The minutes of the Annual General Meeting and the appended list of votes will be retained permanently. They contain the names of the shareholders attending the Annual General Meeting, the names of possible representatives and assistants, numbers of shares and votes and the numbers of voting tickets.

Other data is destroyed when it is no longer necessary for drawing up the minutes or verifying its accuracy.

## **10. Rights of data subjects**

The data subjects have the right to know what data concerning them has been saved. The data subjects have the right to have their data rectified, erased or completed. Any requests must be made in writing and addressed to the contact person mentioned in section 1.

The data subjects have the right to lodge a complaint with the Data Protection Ombudsman if they have any grievances concerning the processing. Instructions for this can be found on the Data Protection Ombudsman website at <https://tietosuoja.fi/>